

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

GOBIND SINGH, M.D., PH.D.,	)	
	)	Civil Action No. 3:17-cv-00400
Plaintiff,	)	
	)	The Honorable Eli Richardson
v.	)	
	)	Magistrate Judge Barbara D. Holmes
VANDERBILT UNIVERSITY MEDICAL	)	
CENTER, and VANDERBILT	)	
UNIVERSITY,	)	
	)	
Defendants.	)	

**DECLARATION OF EDWARD R. MOOR**

I, EDWARD R. MOOR, under penalty of perjury, hereby declare and state as follows pursuant to the instruction of the Court received on January 18, 2022:

1. The attorney-client contract I executed with Dr. Singh is attached hereto as Exhibit 1.
2. An email dated October 29, 2021 I forwarded to Dr. Singh that I had received from Mr. Wright is attached as Exhibit 2.
3. Mr. Wright's October 29, 2021 mentions a "letter." At today's hearing Dr. Singh asked to be provided a copy of that letter. It was provided to him on July 22, 2021 as shown in the email chain (with exhibits) attached as Group Exhibit 3.
4. An email dated November 2, 2021 I sent to Dr. Singh is attached as Exhibit 4.
5. Emails dated November 11 and 12, 2021 between the undersigned and Dr. Singh's father are attached as Group Exhibit 5.
6. An email dated November 17, 2021 I sent to Dr. Singh and his father is attached as Exhibit 6.

7. An email dated November 29, 2021 I sent to Dr. Singh and his father is attached as Exhibit 7. Text that might be construed as legal advice on the issue has been redacted.

8. A December 13, 2021 email I sent Plaintiff is attached as Exhibit 8.

9. An email I received from Dr. Singh on January 4, 2022 is attached as Exhibit 9.

10. A second email I received from Dr. Singh on January 4, 2022 is attached as Exhibit 10.

11. An email dated January 5, 2022 that I sent Dr. Singh is attached as Exhibit 11.

12. An email dated January 14, 2022 that I sent Dr. Singh is attached as Exhibit 12.

13. A second email dated January 14, 2022 that I sent Dr. Singh is attached as Exhibit 13.

14. An email dated January 18, 2022 that I sent Dr. Singh is attached as Exhibit 14, with the dropbox link redacted.

15. A screenshot from my cell phone showing calls to Dr. Singh at 917-880-7647 on November 21, 2021, December 1, 2021 and December 10, 2021 is attached as Exhibit 15.

16. The call log from my business phone showing calls to Dr. Singh at 917-880-7647 on November 4, 2021, November 11, 2021, December 13, 2021, and December 27, 2021 is attached as Exhibit 16.

17. A screenshot from my cell phone showing a call to Dr. Singh's father at 719-640-2760 on December 10, 2021 is attached as Exhibit 17.

18. The call log from my business phone showing a call to Dr. Singh's father at 719-640-2760 on December 13, 2021 is attached as Exhibit 18.

19. None of the phone calls I made were answered or returned. I left voicemail messages.

20. I received or sent no other email to or from Dr. Singh or his father other than that listed above between October 29, 2021 and this filing.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
\_\_\_\_\_  
Edward R. Moor

Executed on January 18, 2022, in Chicago, Illinois.

### **CERTIFICATE OF SERVICE**

I hereby certify that on January 18, 2022 I electronically filed the foregoing Declaration and the referenced exhibits with the Clerk of the Court using CM/ECF system, which will send notification of such filing to all registered users, including those listed below:

Luther Wright Jr.  
Ogletree, Deakins, Nask, Smoak & Stewart, P.C.  
SunTrust Plaza  
401 Commerce Street, Suite 1200  
Nashville, Tennessee 37219  
[luther.wright@ogletree.com](mailto:luther.wright@ogletree.com)

and

Seamus T. Kelly, TN # 032202  
David J. Goldman, TN # 035151  
Music City Law, PLLC  
209 10th Avenue South, Suite 560  
Nashville, TN 37203  
[seamus@musiccityfirm.com](mailto:seamus@musiccityfirm.com)

I further certify I emailed the foregoing Declaration and the referenced exhibits to Dr. Gobind Singh at [gobind.singh@gmail.com](mailto:gobind.singh@gmail.com) on January 18, 2022.

/s/ Edward R. Moor